

EXHIBIT 154

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), I, Alice Cuprill-Comas, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.

2. I am the General Counsel of the Oregon Health and Science University (“OHSU”) in Oregon.

3. OHSU is committed to equitable student success, which includes a commitment to educational access for Deferred Action for Childhood Arrivals (“DACA”) recipients – also known as “Dreamers.”

4. As Oregon’s only academic medical center, OHSU’s mission is to: (a) educate tomorrow’s health professionals, scientists, engineers and managers in top-tier programs that prepare them for a lifetime of learning, leadership and contribution; (b) explore new basic, clinical and applied research frontiers in health and biomedical sciences, environmental and biomedical engineering and information services, and translate these discoveries, wherever possible, into applications in the health and commercial sectors; (c) deliver excellence in healthcare, emphasizing the creation and implementation of new knowledge and cutting edge technologies; and (d) lead and advocate for programs that improve health for all Oregonians, and extend OHSU’s education, research and healthcare missions through community service, outreach and partnerships.

5. I have confirmed that DACA recipients are registered students in OHSU’s degree-granting programs and that OHSU employs DACA recipients.

6. Rescinding DACA will adversely impact current DACA recipients enrolled at OHSU who will be unable to plan for the future, study abroad, simultaneously work to pay costs and fees, and obtain certain financial aid and scholarships. These harms will damage the educational mission of OHSU and its ability to meet the healthcare workforce needs of the State of Oregon.

7. Make OHSU has encouraged DACA recipients to apply for admission as part of its strong commitment to diversity, equity and inclusion. These students often have had to overcome significant challenges in order to gain acceptance and bring critical perspectives, insights and experience to OHSU. Rescinding DACA will cause many high-achieving students to drop out. As a result OHSU will lose the diversity and enrichment this population brings to our university community.

8. Rescission of the DACA program would affect OHSU's revenues derived from currently-enrolled students. A DACA recipient student enrolled in OHSU's Doctor of Dental Medicine program at the resident tuition rate, for example, pays \$44,324 per academic year. Thus, for each full time DACA recipient student that either drops out, or is force out, as a result of DACA rescission, OHSU will lose annual revenue.

9. If current DACA students are forced to drop out, OHSU will also lose the value of the financial assistance it has granted to and the other resources it has spent educating students who ultimately do not graduate.

10. DACA rescission will likely harm OHSU's future revenues derived from prospective students. The threat of arrest and deportation, and the inability of such students to work in the United States, will strongly disincentivize such students from expending the resources to obtain an education at OHSU. Without DACA, OHSU will likely see a decline in enrollment, exacerbating the shortage of healthcare professionals in Oregon, particularly in rural areas.

11. OHSU has invested significant amounts of time and money to hire and train the DACA recipients that it employs. Stripping DACA recipients of the ability to work legally will adversely affect OHSU as it will lose the value of its investment, as well as the services of qualified and trained employees.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 19th day of September 2017, at Portland, Oregon.



Alice Cuprill-Comas,
General Counsel
Oregon Health & Science University